

**REMARKS**

Claims 13 and 17 have been canceled to expedite allowance of the present application.  
Entry of the above amendment is respectfully requested.

**Information Disclosure Statement**

Applicants note that an Information Disclosure Statement is being submitted concurrently herewith. Applicants respectfully request that the Examiner consider the disclosed information, and return an initialed PTO/SB/08 form with the next communication from the PTO.

**Rejection over Koyanagi in view of Wyatt**

On page 2 of the Office Action, in paragraph 4, claims 3, 12-14, 16 and 17 are rejected under 35 U.S.C. 103(a) as being unpatentable over Koyanagi et al. (WO 03/072634, wherein the citations are from the English equivalent document US Pg-Pub 2005/0153530) in view of Wyatt et al. (US PgPub 2003/0118946).

In response, Applicants submit that the present invention is not obvious from Koyanagi et al. in view of Wyatt et al. as follows:

1) Initially, Applicants note that as stated previously, the composition of Wyatt et al. comprises diisopropylbenzene having 12 carbon atoms as an essential component, and Wyatt et al. neither disclose nor suggest that diisopropylbenzene has the same advantageous effects as tetramethylbenzene disclosed in Koyanagi et al. Therefore, even if it would have been obvious to combine tetramethylbenzene, cyclohexanone and propylene glycol monomethyl ether acetate which are disclosed as examples of the developer in Koyanagi et al., Applicants submit that it

would not have been obvious to use tetramethylbenzene in an amount of 20% by mass in a mixture of tetramethylbenzene, cyclohexanone and propylene glycol monomethyl ether acetate.

2) The composition of Example 4 in Wyatt et al. contains 20 wt % of benzyl alcohol and 60 wt % of isoparaffinic hydrocarbon. On the other hand, in the present invention, the other solvent other than aprotic polar solvents is limited to the specific compounds and does not include the above-mentioned alcohol or isoparaffinic hydrocarbon. Applicants submit that it would not have been obvious to use tetramethylbenzene in an amount of 20% by mass in a developer consisting of tetramethylbenzene, cyclohexanone and propylene glycol monomethyl ether acetate which does not contain the above-mentioned alcohol or isoparaffinic hydrocarbon, based on the diisopropylbenzene content of 20 wt % in a developer containing solvents which are not included in the remover of the present invention.

3) As Applicants stated previously, Koyanagi et al. and Wyatt et al. relate to a developer, and do not teach the removal of a photosensitive composition containing a pigment or the problem of pigment precipitation which occurs particularly when removing a photosensitive composition containing a pigment. Koyanagi et al. discloses in paragraph [0119] that the photosensitive resin composition can be also used for a color filter, but there is no working Example containing a pigment in Koyanagi et al. Only Example B4 in Koyanagi et al. uses an organic solvent as a developer, but the developer contains an alcohol and does not contain a hydrocarbon, which is quite different in composition from the remover of the present invention. In addition, Wyatt et al. neither disclose nor suggest that a photopolymer which is a developed material contains a pigment, as seen from paragraph [0007].

Therefore, Applicants submit that the present invention is not obvious from Koyanagi et al. in view of Wyatt et al., and withdrawal of this rejection is respectfully requested.

**Rejection over Kamayachi in view of Wyatt**

On page 4 of the Office Action, in paragraph 5, claims 3, 16 and 17 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kamayachi et al. (US Patent 4,943,516) in view of Wyatt et al. (US Pg-Pub 2003/0118946).

In response, Applicants submit that the present invention would not have been obvious from Kamayachi et al. in view of Wyatt et al. for the same reason as stated above in regard to the rejection over Koyanagi in view of Wyatt.

Applicants note that Kamayachi et al. disclose, in Examples 1-8, photosensitive resin compositions containing phthalocyanine green which seems to be one of pigments. However, the developers used in the Examples of Kamayachi et al. are quite different in composition from the remover of the present invention. In addition, Kamayachi et al. do not relate to a remover. They do not teach the removal of a photosensitive composition containing a pigment or the problem of pigment precipitation which occurs particularly when removing a photosensitive composition containing a pigment.

Thus, Applicants submit that the present invention is not obvious over Kamayachi in view of Wyatt, and withdrawal of this rejection is respectfully requested.

**Rejection over Kamayachi in view of Wyatt and further in view of Dhillon**

On page 6 of the Office Action, in paragraph 6, claims 6 and 18 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kamayachi et al. (US Patent 4,943,516) in view of Wyatt et al. (US Pg-Pub 2003/0118946) as applied to claim 3 and in further view of Dhillon (US Patent 4,822,723).

In response, Applicants note that claim 6 depends on claim 3 and claim 18 depends on claim 6, so since the rejection of claim 3 is overcome as discussed above, the rejection of claims 6 and 18 is also overcome, particularly since Dhillon does not make up for the deficiencies of the other references.

Therefore, Applicants submit that the present invention is not obvious over Kamayachi in view of Wyatt and further in view of Dhillon, and withdrawal of this rejection is respectfully requested.

### **Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

Date: November 10, 2009

/Bruce E. Kramer/  
Bruce E. Kramer  
Registration No. 33,725